

Federal Rule of Civil Procedure 6(b)(1)(A) provides that the Court may, for good cause shown, extend the time in which an act may or must be done where a party's request is made before the original time or any previously granted extension expires. M.D. Tenn. R. 6.01 states that an application for an extension of time must be in writing, state the deadline and the requested deadline, provide the reason for the extension, and that any application for such an extension must advise the Court whether the other parties have consented to such a request.

Having stated in writing the deadline and the requested deadline, Counsel for Gemini states the reasons for the extension include, but are not limited to, the following: Settlement discussions among the parties to the underlying litigation are in progress. Counsel for Gemini does not want to do anything that might impede the opportunity for resolution by settlement.

In compliance with the rule and to determine whether anyone contends that such an extension would create a prejudice, Counsel for Gemini has reached out to Counsel of Record for all of the parties and has requested their consent to the extension. Counsel of Record for all of the parties have provided their consent to the extension.

Respectfully submitted,

HARWELL & HURST PLLC

By: s/ Marc H. Harwell

MARC H. HARWELL, BPR #013817

832 Georgia Avenue, Suite 510

Chattanooga, TN 37402

Telephone: 423-756-7333

E-mail: marc@harwelllawgroup.com

Attorneys for Defendant, Gemini Insurance Company

CERTIFICATE OF SERVICE

I, the undersigned attorney, do hereby certify that the foregoing pleading was electronically filed with the Clerk of Court using the CM/ECF filing system which automatically sends email notifications of such filing to the following attorneys of record:

Heather Howell Wright
Jeffrey W. Sheehan
Bradley Arant Boult Cummings LLP
1600 Division Street, Suite 700
Nashville, TN 37203
hwright@bradley.com
jsheehan@bradley.com

Heidi Raschke
Carlton Fields, P.A.
P.O. Box 3239
4221 W. Boy Scout Boulevard, Suite 1000
Tampa, FL 33601-3239
Hrascke@carltonfields.com

M. Andrew Pippenger
Puryear Law Group PLLC
104 Woodmont Blvd., Suite 201
Nashville, TN 37205
apippenger@puryearlawgroup.com

This 20th day of June, 2023.

s/ Marc H. Harwell

MARC H. HARWELL